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JUSTIN T. NASTRO*
PAMELA L. SCHULTZ*
DANIEL J. FITZGERALD*
MICHAEL C. ELLIOTT*

LAW OFFICES OF
FREEHILL HOGAN & MAHAR LLP
80 PINE STREET
NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900

FACSIMILE (212) 425-1901

E-MAIL: reception@freehill.com

www.freehill.com

NEW JERSEY OFFICE
850 BERGEN AVENUE
JERSEY CITY, N.J. 07306
TELEPHONE (973) 623-5514
FACSIMILE (973) 623-3813

CONNECTICUT OFFICE
23 OLD KINGS HIGHWAY SOUTH
DARIEN, CT 06820-4538
TELEPHONE: (203) 921-1913
FACSIMILE (203) 358-8377

* ALSO ADMITTED IN NEW JERSEY
† ALSO ADMITTED IN CONNECTICUT
△ ALSO ADMITTED IN WASHINGTON, D.C.
* ALSO ADMITTED IN LOUISIANA

May 14, 2008

*So amended
5-19-08
Alvin K. Hellerstein*

Our Ref: 134-07/DPM/MAM

BY HAND

The Honorable Alvin K. Hellerstein
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 1050
New York, New York 10007

Re: Trader Special Maritime Enterprises v. Calder Sea Carrier Corp.,
07-5809 (AKH)

Dear Judge Hellerstein:

We represent the Plaintiff Trader Special Maritime Enterprises in connection with the above-referenced Rule B maritime attachment action. We write to respectfully request a 60-day extension of time to serve the Defendant in Greece.

Per its Endorsed Order of March 14, 2007, the Court granted Plaintiff's application to extend the time to effect service upon Defendant (via the Hague Convention) up to and including May 16, 2008. The Greek Central Authority received all documentation it requires to effect service on January 17, 2008. On May 12, we communicated with the Greek Central Authority concerning the status of service. (See copy of e-mail annexed hereto). We have not received any response yet.

In another matter before Judge Stein in which the undersigned is involved (Docket No. 07 CV 2568), the Greek Central Authority took approximately 5 months to effect service and to actually mail the Certificate of Service to us. In light of the foregoing, we respectfully request that the Court grant the within application.

The Honorable Alvin K. Hellerstein
May 14, 2008
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We thank the Court for its attention to this matter.

Respectfully submitted,
FREEHILL HOGAN & MAHAR, LLP

A handwritten signature in black ink, reading "Manuel A. Molina". The signature is written in a cursive, flowing style with a large initial 'M'.

Manuel A. Molina

MOLINA, MANNY A.

From: MOLINA, MANNY A.
Sent: Monday, May 12, 2008 9:49 PM
To: 'E3 DIDDY'
Subject: Trader Special Maritime Services v. Calder Sea Carrier Corp., 07-5809
Attachments: HagueConvFormGreece.pdf

Dear Sirs:

We represent the Plaintiff in connection with the above referenced lawsuit. We have requested the Department of Administrative and Judicial Affairs of the Hellenic Republic to effect service of the Summons and Complaint pursuant to the Hague Convention

The Official Form was received by the Greek Central Authority on January 17, 2008. For easy reference, we attach herewith a copy of the Hague Convention Form (without the translations) sent to the Central Authority.

We write to kindly inquire concerning the status of service upon the defendant.

We look forward to receiving your advices.

Sincerely yours,

MANUEL A. MOLINA
FREEHILL HOGAN & MAHAR LLP
80 Pine Street, New York, N.Y. 10005-1759
Tel: 212-425-1900
Fax: 212-425-1901
Direct: 212-381-3046
E-mail: molina@freehill.com

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